



IPtelX, LLC  
100 Webster Street  
Bay City, MI 48708  
(989) 891-2900

February 14, 2018

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**REDACTED FOR**  
**PUBLIC INSPECTION**

**RE: REQUEST FOR CONFIDENTIAL TREATMENT TO APPLICATION OF IPTELX, LLC FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES PURSUANT TO SECTION 52.15(g) OF THE COMMISSION'S RULES**

Dear Ms. Dortch,

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, IPtelX, LLC ("IPtelX") hereby submits its application requesting authorization to obtain numbering resources.

IPtelX respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. § 0.457 and 0.459, the Commission withhold from public inspection, Exhibit B to this application in its entirety as confidential because the documents contain trade secrets and commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). The information in Exhibit B is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. IPtelX respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibit B is accordingly marked with "Confidential and Proprietary – Filed Under Seal Pursuant to 47 C.F.R. §0.459".

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, IPtelX hereby states as follows:

- 1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT PURSUANT TO 47 CFR § 0.459(b)(1)**

IPtelX seeks confidential treatment of Exhibit B in its entirety to the enclosed application.

**2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION PURSUANT TO 47 CFR § 0.459(b)(2)**

IPtelX is submitting the Confidential agreements between it and its LEC partners, as proof of IPtelX's facilities readiness as required by Section 52.15(g)(3)(i)(D) of the Commission's rules.

**3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED PURSUANT TO 47 CFR § 0.459(b)(3)**

The information for which IPtelX seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors" as defined in 47 CFR § 0.457(d)(2). Exhibit B consists of commercial agreements between IPtelX and its LEC partners of which contain proprietary information concerning IPtelX's network, customers, and services.

**4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION PURSUANT TO 47 CFR § 0.459(b)(4)**

Exhibit B contains information relating to commercial matters that could be used by competitors to IPtelX's disadvantage. IPtelX has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by IPtelX could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to IPtelX.

**5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM PURSUANT TO 47 CFR § 0.459(b)(5)**

Competitors could use IPtelX's proprietary and commercial information to its detriment as they would gain access to sensitive data about how IPtelX provides services as well as about IPtelX's commercial agreements with others in the market that are not normally disclosed to the public.

**6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(6)**

IPtelX has not distributed the information in Exhibit B to the public.

**7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES PURSUANT TO 47 CFR § 0.459(b)(7)**

IPtelX has not previously disclosed the information in Exhibit B.

**8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(8)**

IPtelX requests that Exhibit B be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information in Exhibit B.

**9. OTHER INFORMATION THAT IPTELX BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED PURSUANT TO 47 CFR § 0.459(b)(9)**

The information concerns IPtelX's proprietary network, related to current and planned operations, and as such, is commercially sensitive.

If you should have any questions or concerns, please feel free to contact me at your convenience.

Sincerely,



Jordan R. Dice  
President/CEO  
IPtelX, LLC  
100 Webster Street  
Bay City, MI 48708  
(989) 891-2900 ex. 102  
jordan.dice@iptelx.net

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

<i>In the Matter of</i>	)	<b><u>REDACTED FOR</u></b>
	)	<b><u>PUBLIC INSPECTION</u></b>
<b>IPtelX, LLC</b>	)	
<i>Applicant</i>	)	
For Authorization to Obtain Numbering	)	<b>WC Docket No. 18 - _____</b>
Resources Pursuant to Section 52.15(g) of	)	
the Commission's Rules	)	

**APPLICATION OF IPTELX, LLC FOR AUTHORIZATION TO  
OBTAIN NUMBERING RESOURCES**

IPtelX, LLC ("IPtelX"), a Michigan Limited Liability Company, pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, respectfully requests authorization to obtain numbering resources as described below.

As set forth in *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015), an interconnected VoIP provider may obtain numbering resources from the Numbering Administrators upon a showing that it is authorized to provide service in the area for which the numbering resources are requested. Such authorization may be obtained upon an application to the Commission containing the information detailed in Sections 52.15(g)(3)(i)(A)-(F) of the Commission's rules. IPtelX hereby requests the Commission grant it that authorization and subject to reserving the nationwide authority anticipated, it presently intends to initially obtain numbering resources in the following states: Arizona, California, District of Columbia, Florida, Georgia, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, Nevada, New York, Ohio, Oklahoma, Pennsylvania, Texas, Virginia, and Washington. IPtelX intends to use the numbering

resources to support interconnected VoIP services to its clients and in support of this application, provides the following information:

**I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)**

**(A) § 52.15(g)(3)(i)(A)**

<b>Applicant's Name</b>	IPtelX, LLC
<b>Address</b>	100 Webster Street Bay City, Michigan 48708
<b>Telephone</b>	(989) 891-2900
<b>Qualified Contact *</b>	Jordan R. Dice President/CEO 100 Webster Street Bay City, Michigan 48708 (989) 891-2900 ex. 102 jordan.dice@iptelx.net

*\* The qualified contact is hereby designated on behalf of IPtelX to address issues relating to regulatory requirements, compliance with Commission's rules, 911, and law enforcement*

**(B) § 52.15(g)(3)(i)(B)**

IPtelX hereby acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's Rules is subject to compliance with applicable Commission numbering rules as well as to the numbering authority delegated to the states. IPtelX further acknowledges this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers.

**(C) § 52.15(g)(3)(i)(C)**

IPtelX hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators.

**(D) § 52.15(g)(3)(i)(D)**

IPtelX hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. IPtelX has an Operating Company Number (OCN) of '088J' issued by the National Exchange Carrier Association (NECA) and appears in the Internet Protocol Enabled Services (IPES) category [*NECA Letter attached as Exhibit A*]. IPtelX has further established its OCN as an Administrative Operating Company Number (AOCN) in the Business Integrated Routing and Rating Database System (BIRADS) and as a Service Provider ID (SPID) in the Number Portability Administration Center, Service Management System (NPAC/SMS). IPtelX also has an Access Carrier Name Abbreviation (ACNA) of 'IXZ' which has been established in the Common Language Online Entry System (CLONES). Therefore, IPtelX is fully capable of provisioning and managing common language codes identifying its Switches and Point of Interfaces (POI's), routing and rating details for its numbering resources in the Local Exchange Routing Guide (LERG), and subscription versions for local number portability in and out of its network. Lastly, IPtelX has entered into agreements with several LEC's for interconnection to the PSTN and routing of its numbering resources it intends to obtain pursuant to this application [*LEC Agreements attached as Exhibit B*].

IPtelX respectfully requests the agreements attached in Exhibit B receive confidential treatment in their entirety, pursuant to Section 0.459 of the Commission's rules as the contents of said agreements contain trade secrets and commercially sensitive information that is not publicly available, the disclosure of which would cause economic harm to IPtelX.

**(E) § 52.15(g)(3)(i)(E)**

IPtelX has established a Form 499 Filer ID of ‘830940’ and hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604I(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR § 52.17 and 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9. A written certification confirming compliance with these obligations has been given by an officer of IPtelX [*Certification Letter – Exhibit C*].

**(F) § 52.15(g)(3)(i)(F)**

IPtelX hereby certifies that it has the financial, managerial, and technical expertise to provide reliable service. The company is financially stable, led by a strong, experienced management team with substantial experience in the telecommunications industry, and has sufficient technical knowledge and infrastructure in place to provide reliable services. IPtelX’s key management and technical personnel are listed below with biographies, none of which are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

**President/CEO**

Jordan R. Dice

*Jordan Dice is a co-founder of IPtelX and has served as the company’s President and CEO since its inception in 2013. Dice is responsible for overseeing the company’s day-to-day operations and industry relationships. A graduate of finance, office administration, and computer science, Dice has worked in the telecommunications industry for nearly 15 years and has diverse experience in negotiating carrier contracts and engineering voice and data networks. In addition to IPtelX, Dice founded StarNet Wireless, a local internet service provider based in Bay City, Michigan at age 14. The company was a success, reaching over 1,000 subscribers within two years of operation. Dice later developed an interest in real estate and holds a commercial brokers license. Always up for a challenge, Dice never passes on an opportunity, which he says has led to his success.*

**Co-Founder**

Clifford V. Dice

*Clifford Dice is the CEO and founder of DICE Corporation, one of the leading research and development companies in the security industry. As an innovator of software solutions that have helped shape the security industry, Dice has created many of the products and solutions used by some of the largest security companies. After obtaining a degree from Northwood University, Dice founded a software consulting company and was employed by various CPA firms as an accounting and business manager. In the early 1990s, Dice was challenged by a security monitoring company to write an accounting solution, when they said others have tried but no one was able to develop what was needed. Loving a challenge, Dice developed the software, which led to DICE Corporation in 1992. Some of DICE Corporation's top services include alarm monitoring, service, sales, smart home, and telecom solutions. DICE also operates the industry's largest cloud hosting center, supplying over one million subscribers with direct service and six million subscribers with alarm signaling telecom services.*

**(G) § 52.15(g)(3)(i)(G)**

IPtelX hereby certifies pursuant to Sections 1.2001 and 1.2002 of the Commission's rules, that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

**II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)**

As required by Section 52.15(g)(3)(iv), IPtelX will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within 30 days of any changes. IPtelX will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

**III. CONCLUSION**




Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, IPtelX respectfully requests the Commission grant this application for authorization to obtain numbering resources, nationwide.

### **OFFICER VERIFICATION**

I, Jordan R. Dice, President/CEO of IPtelX do hereby declare under penalty of perjury that the above Application is true and correct to the best of my knowledge and belief. Further, I attest that the submission is complete and accurate, with no material omissions.

Dated: February 14, 2018

  
\_\_\_\_\_  
JORDAN R. DICE  
President/CEO  
IPtelX, LLC  
100 Webster Street  
Bay City, MI 48708  
(989) 891-2900 ex. 102  
jordan.dice@iptelx.net

# **EXHIBIT A**

## **NECA Letter**



80 South Jefferson Road  
Whippany, NJ 07981

Tuesday, August 01, 2017

Mr. Jordan R. Dice  
IPtelX, LLC  
100 Webster Street  
Bay City, Michigan 48708  
Phone: 989-891-2900  
Fax: 989-891-2901  
Email: jordan.dice@iptelx.net

Dear Mr. Jordan R. Dice:

This letter confirms your request for company code(s) for IPtelX, LLC, headquartered at 100 Webster Street, Bay City, Michigan 48708.

<u>Company Code</u>	<u>Company Name</u>	<u>Category</u>
088J	IPtelX, LLC	IPES

If you have any questions, please contact the Company Code Administrator on (973) 884-8105 or at [ccfees@neca.org](mailto:ccfees@neca.org). For future code requests, please use our online ordering system, or print the latest version of the company code request form from our website at <http://www.neca.org/>.

Sincerely,

A handwritten signature in dark ink that reads "Panchali Das". The signature is written in a cursive, flowing style.

Panchali Das  
Product Manager - Tariff No. 4

**EXHIBIT B**

**LEC Agreements**

**Confidential and Proprietary – Filed Under Seal**

**Pursuant to 47 C.F.R. §0.459**

## **EXHIBIT C**

### **Certification Letter**



IPtelX, LLC  
100 Webster Street  
Bay City, MI 48708  
(989) 891-2900

February 14, 2018

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**RE: IPTELX, LLC CERTIFICATION OF COMPLIANCE WITH ITS OBLIGATIONS  
UNDER COMMISSION RULES**

Dear Ms. Dortch,

The purpose of this letter is to certify the following before the Federal Communications Commission on application of IPtelX, LLC for Authorization to Obtain Numbering Resources, dated February 14, 2018:

- IPtelX is current on its Form 499 filings and Universal Service Fund contributions pursuant to 47 CFR part 54, subpart H.
- IPtelX is current on its Telecommunications Relay Service Fund contributions pursuant to 47 CFR § 64.604I(5)(iii).
- IPtelX is current on its North American Number Plan Fund contributions pursuant to 47 CFR § 52.17.
- IPtelX is current on its Local Number Portability Fund contributions pursuant to 47 CFR § 52.32.
- IPtelX is current on its obligation to pay regulatory fees to the Federal Communications Commission pursuant to 47 CFR § 1.1154.
- IPtelX is in compliance with its obligations to provide 911 service pursuant to 47 CFR part 9.

If you should have any questions or concerns, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan R. Dice". The signature is fluid and cursive, with a large initial "J" and "D".

Jordan R. Dice  
President/CEO  
IPtelX, LLC  
100 Webster Street  
Bay City, MI 48708  
(989) 891-2900 ex. 102  
jordan.dice@iptelx.net